

**IN THE UNITED STATES DISTRICT COURT
THE NORTHEN DISTRICT OF ILLINOIS
EASTERN DIVISION**

S. JAIN, for herself, and as parent of and)		
for her son "A", a minor,)		MOTION TO FILE DECLARATION
Plaintiffs,)		AS A SEALED, CONFIDENTIAL
)		DOCUMENT
vs.)		Case Number: 1:17-cv-00002
)		Hon. Ronald A. Guzman, U.S.D.J.
BUTLER ILLINOIS SCHOOL)		Hon. Sidney I. Schenkier, U.S. Mag.
DISTRICT 53,)		
Defendants.)		
)		

**MOTION TO FILE DECLARATION
AS A SEALED, CONFIDENTIAL DOCUMENT**

I request leave to file my Declaration in support of my motion to withdraw as Plaintiffs's attorney, as a sealed, confidential document, which is not to be served on the Defendants because the contents involve privileged communications with Plaintiffs. It has been served on Plaintiffs.

I have asked Plaintiffs to state the reasons for their objections to my Withdrawal Motion both before and after it was filed, but I received no response. I have been told that Plaintiff, Dr. S. Jain, made serious accusations and criticisms of me when the Withdrawal Motion was first considered by the Court. I was not present then and had asked Local Counsel to speak for me if I was not granted leave to appear by telephone, which I wasn't.

I have a right to defend myself but also seek to avoid the unnecessary disclosure to Defendants of privileged communications had with my clients. I do not believe that they have a right to disclosure of that information.

I, accordingly, request that My Declaration In Support of my Withdrawal Motion be

sealed and kept confidential, i.e., not disclosed to Defendants.

Respectfully submitted,

October 2, 2017



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CERTIFICATE OF SERVICE

Richard P. Caro hereby certifies that he did on October 2, 2017, serve the Plaintiffs' Motion for to file his Declaration in support of his Motion to Withdraw and Notice of Entry was given automatically to all parties by the Court and I have served Plaintiffs with this Motion by email and by First Class mail also on October 2, 2017, but the Declaration was served only on Plaintiff S. Jain:

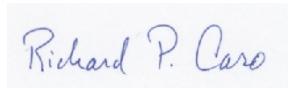
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Dated: October 2, 2017



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